

RICHARD A. DABNEY
In Pro Se
21143 Hawthorne Blvd #377
Torrance CA 90503
Telephone: 310.462.5077

<input checked="checked" type="checkbox"/> FILED	<input type="checkbox"/> LODGED
<input type="checkbox"/> RECEIVED	<input type="checkbox"/> COPY
NOV 23 2009	
CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	B. DEPUTY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Securities & Exchange Commission,
Plaintif,
vs.
Alliance Transcription Services, Inc., et al.,
Defendants.

No. CV-08-1464-PHX-NVW

**Motion to Re-Open Record and request for authority to retain counsel
and request for oral argument**

Defendants Richard Dabney and Raymond Dabney respectfully ask for the authority to retain counsel for oral argument highlighting the misrepresentations and inconsistencies surrounding the purported truths the SEC is representing as facts of the underlying circumstances.

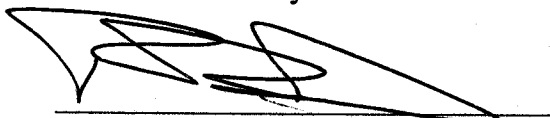
It is the essential for us to hire this attorney to explain the manner of which the events and conduct actually occurred accurately, as well as expose the misrepresentations of conduct and for us to have an opportunity to explain.

We strongly believe that the facts we will disclose will show that the SEC has been misrepresented and they are on relying on those misrepresentations as the basis of their underlying facts and arguments.

We need to retain counsel to fully explain the true events that actually took place.

Thank you for your serious consideration on these serious matters of accusation.

Dated this 19th day of November 2009.


RICHARD A. DABNEY, In Pro se